



UNIVERSITY COMMERCIAL
SERVICES PLYMOUTH

Data Retention & Disposal Policy

UCSP Ltd

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First Published:	May 2021
Next Review Date:	May 2022

Table of Contents

1. Introduction	3
2. Purpose & Scope	3
3. Definition of a data registry schedule.....	3
4. Implementation & Review	4
5. Disposal of Records.....	4

Data Retention & Disposal Policy

1. Introduction

This policy sets out University Commercial Services Plymouth Limited's (UCSP Ltd's) definition of, commitment to and requirements for the retention and disposal of records. It defines the need to understand the nature of the records created and held by the organisation and the requirements for the retention and disposal of each. This Data Retention and Disposal Policy provides management direction and support for the retention and disposal of records across the business. It is applicable to, and should be communicated to; staff, students and other relevant parties.

2. Purpose & Scope

The aim of this policy is to ensure that records are managed consistently across all areas of UCSP Ltd's business, that they are retained for sufficiently long to meet operational and business needs, and demonstrate compliance with legal, regulatory and audit requirements, and thereafter disposed of in an appropriate, legally compliant manner, irrespective of format.

The data retention & disposal policy is also used to ensure that UCSP Ltd balances the requirement to not hold on to records unnecessarily, with the need to prevent the premature disposal of information we are required to keep. This policy refers to the Data Registry Schedule where details of all records are outlined along with the retention periods. The retention period is applied to records in whatever medium they are held (paper, electronic etc.).

The policy applies to anyone who has access to personal data as part of their relationship with UCSP Ltd. This includes, but is not limited to, all staff, students and contractors within UCSP Ltd (e.g. permanent, fixed term and temporary staff, any third-party representatives or sub-contractors, agency workers, interns and agents engaged with UCSP LTD). Unless otherwise stated, it is the responsibility of departments to retain the items listed in the Data Registry Schedule and to assign specific individuals to have responsibility for each category.

3. Definition of a data registry schedule

The data registry schedule is a practical document that details the classes of records held by UCSP Ltd and metadata about them for the purposes of preventing premature destruction or unnecessary retention of records. It lists the length of time for which categories of records should be retained in order to meet compliance and business requirements. It specifies when records need to be destroyed and the person(s) responsible to ensure this. It records:

- categories of records held
- how the data is collected
- rationale for holding the data
- the format and location in which the data is held
- who has access to the data
- who, if anyone, is the data shared with
- if there is a legal or legislative requirement to hold the data
- how long the data is retained or archived for
- additional comments

The data registry schedule is located on UCSP Ltd's Management SharePoint site.

4. Implementation & Review

Responsibility for implementing the policy will rest with the Operations Director and Management Team. A log of all data should be kept and maintained in the form of a Data Registry Schedule detailing when specific records meet their destruction/disposal date.

The schedule should be updated by all departments on an ongoing basis. A review must be organised at least annually by the Data Protection Officer (commonly the Operations Director). It must also be updated to reflect changes in legislation, regulation or audit requirements and/or UCSP Ltd's business practice. Where a department requires a record for longer than the retention period specified in the retention guide, this should be notified to the Data Protection Officer for review.

5. Disposal of Records

Once it has been determined that a document or record is no longer required, appropriate action should be taken against the records as outlined in the Data Registry Schedule. These will be:

Destroy – The record can be destroyed using the appropriate method. This may be securely 'deleted' for electronic records, or disposed of for recycling in the case of non-confidential paper records. All **confidential** records, including those containing **personal** or **financial** information should be disposed of using confidential waste disposal. A record should be kept of the destruction.

Review – Documents marked for review at the end of their retention period may be required for a longer period. Therefore their status should be checked before any action is taken.

Under no circumstances should paper documents containing personal data or confidential information be simply binned or deposited in refuse tips. To do so could result in unauthorised disclosure of such information to third parties and render UCSP Ltd liable to prosecution or enforcement action.